

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Zurich American Insurance Company

Plaintiff,

vs.

Asphalt Paving Systems, Inc.

Defendant.

Civil Action No.:

1:22-cv-01535-CPO-MJS

**[PROPOSED] ORDER ON JOINT
MOTION TO EXTEND CASE
MANAGEMENT DEADLINES**

This matter coming to be heard on the Joint Motion to Extend Case Management Deadlines submitted by Plaintiff Zurich American Insurance Company (“Zurich”) and Defendant Asphalt Paving Systems, Inc. (“Asphalt”), good cause having been shown, the Court extends the remaining case management deadlines in the Scheduling Order (ECF Nos. 42, 48) as follows:

	Current Deadline	Extended Deadline
Pretrial factual discovery	January 30, 2024	April 19, 2024
Plaintiff’s expert disclosures	February 15, 2024	May 6, 2024
Defendant’s expert disclosures	March 15, 2024	June 3, 2024
Expert depositions	April 16, 2024	July 8, 2024
Dispositive motions	May 15, 2024	August 3, 2024

All other terms of the Scheduling Order remain in full force and effect.

ENTERED BY: _____

DATED:

JOINTLY SUBMITTED BY:

PLAINTIFF

/s/ Christopher B. Fontenelli

Christopher B. Fontenelli (082532014)
LOCKE LORD LLP
One Gateway Center
Newark, NJ 07102
T: 973-520-2300
cfontenelli@lockelord.com

Steven T. Whitmer (*pro hac vice*)
Julie L. Young (*pro hac vice*)
Hannah M. Oswald (*pro hac vice*)
LOCKE LORD LLP
111 South Wacker Drive
Chicago, IL 60606
T: 312-443-0254
swhitmer@lockelord.com
jyoung@lockelord.com
hannah.oswald@lockelord.com

*Attorneys for Plaintiff Zurich American
Insurance Company*

DEFENDANT

/s/ Amanda Szmuc

John F. Palladino (042771989)
Colin G. Bell (018552005)
Amanda Szmuc (409552022)
HANKIN SANDMAN PALLADINO
WEINTROB & BELL, P.C.
30 S. New York Avenue
Atlantic City, NJ 08401
T: 609-344-5161
john@hankinsandman.com
coling@hankinsandman.com
amandas-h@hankinsandman.com

*Attorneys for Defendant Asphalt Paving
Systems, Inc.*